



COMMONWEALTH OF PENNSYLVANIA

January 24, 2025

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. Pike County Light & Power Company
(Electric) / Docket No. R-2024-3052359**

Dear Secretary Chiavetta:

Enclosed please find the Complaint, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : **Docket No. R-2024-3052359**
:
v. :
:
Pike County Light & Power Company :
(Electric) :
:

**COMPLAINT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

1. The Complainant is:

NazAarah Sabree
Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101

2. The name and address of the attorneys for the Office of Small Business Advocate (“OSBA”) are as follows:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
relyttle@pa.gov

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
sgray@pa.gov

3. The respondent utility is:

Pike County Light & Power Company
105 Schneider Lane
Milford, PA 18337

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the Pike County Light & Power Company. On January 14, 2025, Pike Electric filed Supplement No. 105 To Tariff Electric Pa P.U.C. No. 8 (“Tariff”). On January 15, 2025, it filed a replacement to page 89 of the Tariff.

6. Tariff Supplement No. 105 has been filed to reflect:

- (a) Increased delivery (i.e., customer, per kWh, and per kW) charges applicable to Service Classification SC1 Residential, SC1 Residential Space/Water Heating, SC2-S Small Commercial & Industrial Secondary, SC2-P Small Commercial & Industrial Primary, SC3 Municipal Street Lighting, SC4 Private Lighting
- (b) Customers will begin paying a monthly charge of \$41.98 per month for *manual* meter reads.
- (c) Pike is recommending that electronic payment fees charged by our third-party vendor become aggregated and included in the Company’s cost of service.
- (d) Pike plans to keep a customer charge of \$37 to reconnect power after the customer’s power is shut off for failure to pay their electric bill. For customers who ask for a disconnect, Pike proposes to charge customers a \$50 fee to disconnect and another \$50 fee to reconnect to its electric service.

7. Pike has been operating under electric rates that went into effect on July 28, 2021. The Company proposes to increase its delivery rates to \$1,874,600, a 50.52 percent common equity ratio, with a cost of equity return of 9.75 percent.

8. The customer class inequities shown in Pike's Tariff Schedules PMN-2-E and PMN-3-E indicate that the SC2-S Small Commercial and Industrial Secondary and the SC2-P Large Commercial and Industrial Primary customer classes are surplus and are subsidizing the SC1 Residential and Residential Space/Water Heating, the SC4 Municipal Lighting, the 2 and SC4 Private Lighting customer classes which are deficient.

9. After preliminary review of the materials filed by the Company, Complainant believes, and therefore avers, that the materials submitted by the company, may be insufficient to justify the rate increase requested and that the Company's present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

10. Complainant believes, and therefore avers, that the Company's proposed tariff changes and proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, inter alia, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations and may not be supported by the materials filed by Pike.

11. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- (a) Suspend and investigate Pike’s Supplement No. 105 To Tariff Electric Pa P.U.C. No. 8;
- (b) At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 105 To Tariff Electric Pa P.U.C. No. 8 to the extent required to make certain that Pike’s Electric’s rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- (c) Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: January 24, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2024-3052359
	:	
v.	:	
	:	
Pike County Light & Power Company (Electric)	:	
	:	
	:	

**PUBLIC STATEMENT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court.

This public statement relates to the filing today by the Small Business Advocate (“OSBA”) of a Complaint against the proposed base rate tariff filing, Supplement No. 105 To Tariff Electric Pa P.U.C. No. 8 by the Pike County Power and Light Company (“Pike” and/or “Company”) The Small Business Advocate files this formal complaint against the Company’s proposed base rate tariff filings to protect the interests of the Company’s small business customers.

A thorough inquiry by the Commission into all elements of the Company's proposed base rate tariff filing is necessary to ensure that the tariff filings are lawful, just, reasonable, and not discriminatory to Pike's small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed base rate tariff filings. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by Pike to be lawful, just, reasonable, and not discriminatory to the Company's small business customers.

Dated: January 24, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 24, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2024-3052359
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v.	:	
	:	
Pike County Light & Power Company (Electric)	:	
	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
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501 Corporate Circle, Suite 302
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Date: January 24, 2025

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399